



## Land and Chemicals Division

Type of Document: ☒ Notice of Violation and Inspection Report/Checklist  
☐ No Violation Letter and Inspection Report/Checklist  
☐ Letter of Acknowledgment  
☐ Information Request  
☐ Pre-Filing and Opportunity to Confer  
☐ State Notification of Enforcement Action  
☐ Return to Compliance  
☐ Other Correspondence- NOD, memo to ORC

Facility Name: Newark Electro Plating, Inc.

City: Newark State: OH

U.S. EPA ID#: OHD004294468

Assigned Staff: Derrick Samaranski Phone: 312-886-7812

Name	Signature	Date
Author	<i>Derrick Samaranski</i> 8/04	08/29/2011
Regional Counsel	<i>9/10</i>	9/29/24/
Section Chief	<i>WANT</i>	9/29/24 w/Ed:TD
Branch Chief	<i>RK</i>	10-4-11

RFC  
9/29  
MG  
10/3

### Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make one copy of the contents of this folder for the official file; Note: original inspection report goes into file room.
3. Scan the letter and save the file in the appropriate share drive folder.
4. Mail the original certified mail.
5. Distribute office copies and cc's and bcc's by email.

*Once the certified mail receipt is returned:*

6. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room.
7. E-mail staff the date that the letter was received by facility.

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**Mark Shaner**  
Human Resources Manager  
Newark Electro Plating, Inc  
Newark, OH 43055

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

*Sharon Baglan* *11/06/74*

C. Signature

*Sharon Baglan*

☒ Agent ☐ Addressee

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4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article

(Trans)

**7009 1680 0000 7644 8109**

PS Form 3811, March 2001

Domestic Return Receipt

102595-01-M-1424



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

OCT 06 2011

**CERTIFIED MAIL 70091680000076448109**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:  
LR-8J

Mr. Mark Shaner  
Human Resources Manager  
Newark Electro Plating, Inc.  
30-32 East Harrison Street  
Newark, Ohio 43055

Re: Notice of Violation  
RCRA Compliance Evaluation Inspection Newark Electro Plating  
EPA I.D. No.: OHD004294468

Dear Mr. Shaner:

On May 18, 2011 a representative of the U.S. Environmental Protection Agency inspected Newark Electro Plating, Inc. (Newark Electro Plating) located in Newark, Ohio. The purpose of the inspection was to evaluate Newark Electro Plating's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on the information provided by Newark Electro Plating personnel, review of records, and personal observations made by the inspector at the time of the investigation, EPA has determined that Newark Electro Plating is engaged in the management of hazardous waste without a hazardous waste storage permit, and is in violation of the requirements of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from having a hazardous waste storage operating permit, Newark Electro Plating must be in compliance with the conditions of OAC 3745-52-34(A) and (C) [40 CFR § 262.34(a) and (c)]. We find that Newark Electro Plating is in noncompliance with the following conditions for the storage permit exemption, and in violation of the following requirements:

1. A large quantity generator must determine whether its waste is hazardous. See, OAC 3745-52-11 [40 CFR § 262.11]. At the time of the inspection, Newark Electro Plating had not made a hazardous waste determination of the following wastes: solidified caustic waste accumulated in fiberglass tank in Dept. 3 for approximately five years, waste sludge accumulated in Dept. 6 in a process tank decommissioned approximately nine years ago, chemical build-up waste around tank 4-14 in Dept. 4, sludge and zinc solution waste

accumulated in a decommissioned zinc tank in Dept. 7, concrete rubble waste generated and accumulated in Dept. 7, and potassium hydroxide in a 55-gallon drum in Dept. 7. Newark Electro Plating, therefore, violated the above-referenced generator requirement.

2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator shall maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air soil, or surface water which could threaten human health or the environment. See, OAC 3745-52-34, par. (A)(4), 3745-65-31 [40 CFR §§ 262.34(a)(4), 265.31]. This is also a requirement of owners and operator of hazardous waste storage facilities, under OAC 3745-65-31 [40 CFR § 265.31]. At the time of the inspection, Newark Electro Plating failed to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air soil, or surface water which could threaten human health or the environment as evidenced by: accumulation of liquid between process tanks in Dept. 1 as result of missing baffles between tanks, deteriorated coating of trench line in Dept. 2, and build-up of chemical material around tank 4-14 (alkaline tank). Newark Electro Plating, therefore, failed to comply with the above-mentioned condition for a storage permit exemption, and violated the storage facility maintenance requirement.
3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using containers to accumulate hazardous waste must keep the containers closed during storage, except when it is necessary to add or remove waste. See, OAC 3745-52-34, par. (A)(1)(a), 3745-66-73, par. (A) [40 CFR §§ 262.34(a)(1)(i), 265.173(a)]. This is also a requirement of owners and operator of hazardous waste storage facilities, under OAC 3745-66-73, par. (A) [40 CFR § 265.173(a)]. At the time of the inspection, Newark Electro Plating failed to keep a twenty cubic yard roll-off box accumulating F006 waste in the facility's warehouse closed and no wastes were being added or removed from the container. Newark Electro Plating, therefore, failed to comply with the above-mentioned condition for a storage permit exemption, and violated the storage facility container closure requirement.
4. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using containers to accumulate hazardous waste may not store the waste for longer than 90-days. See, OAC 3745-52-34, par. (A) and (B) [40 CFR § 262.34(a) and (b)]. At the time of the inspection, Newark Electro Plating stored the F006 waste in the roll-off box in the facility's warehouse for 127 days. The roll-off box had a hazardous waste label with an accumulation start date of 01/11/2011. Newark Electro Plating, therefore, failed to comply with the above-mentioned condition for a storage permit exemption.
5. In order to avoid the need for a hazardous waste storage permit, large quantity generator must provide its employees with hazardous waste responsibilities with annual refresher training. See, OAC 3745-52-34, par. (A)(4), 3745-65-16, par. (C) [40 CFR §§ 262.34(a)(4), 265.16(c)]. This is also a requirement of owners and operator of hazardous waste storage facilities, under OAC 3745-65-16, par. (C) [40 CFR § 265.16(c)]. At the time of the

inspection, Newark Electro Plating failed to provide its employees with annual hazardous waste training during years 2007-2011. Training records indicated that last RCRA training was offered in 2006. Newark Electro Plating, therefore, failed to comply with the above-mentioned condition for a storage permit exemption, and violated the storage facility annual refresher training requirement.

6. In order to avoid the need for a hazardous waste storage permit, a large quantity generator accumulating hazardous waste in containers must conduct and record weekly inspections of the container storage areas in an inspection log. See, OAC 3745-52-34, par. (A)(1)(a), 3745-66-74 [40 CFR §§ 262.34(a)(1)(i), 265.174]. This is also a requirement of owners and operator of hazardous waste storage facilities that use containers to store hazardous waste, under OAC 3745-66-74 [40 CFR § 265.174]. At the time of the inspection, Newark Electro Plating failed to conduct weekly inspections of its hazardous waste roll-off box since January of 2010. The weekly inspection records were only available until January 2010, with no records thereafter. Newark Electro Plating, therefore, failed to comply with the above-mentioned condition for a storage permit exemption, and violated the storage facility weekly container area inspection requirement.
7. A small quantity handler of universal waste must contain used fluorescent lamps in containers or packages that are structurally sound, adequate to prevent breakage, compatible with the contents of the lamps, and closed. See, OAC 3745-273-13, par. (D)(1) [40 CFR § 273.13(d)(1)]. At the time of the inspection, Newark Electro Plating failed to store used fluorescent lamps in containers; the lamps were being stored loosely in Dept. 7. Newark Electro Plating, therefore, violated the above- referenced universal waste small quantity handler used fluorescent lamp management requirement.
8. A small quantity handler of universal waste must label each lamp or a container or package in which such lamps are contained with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." See, OAC 3745-273-14, par. (E) [40 CFR § 273.14(e)]. At the time of the inspection, Newark Electro Plating failed to label its used fluorescent lamps accumulated in Dept. 7 with one of the appropriate phrases. Newark Electro Plating, therefore, violated the above- referenced universal waste small quantity handler labeling requirement.
9. A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated. See, OAC 3745-273-15, par. (A) [40 CFR § 273.15(a)]. At the time of the inspection, Newark Electro Plating failed to demonstrate that its used fluorescent bulbs stored in Dept. 7 were being accumulated for less than one year. The records indicated that the last time Newark Electro Plating offered its used fluorescent lamps for recycling occurred on 09/12/2008. Newark Electro Plating, therefore, violated the above- referenced universal waste small quantity handler accumulation time requirement

10. A large quantity generator who accumulates hazardous waste on-site for more than 90 days, and who does not meet the conditions for a permit exemption of OAC 3745-52-34, par. (A) and (C) [40 CFR § 262.34 (a) and (c)], is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage permit. See, OAC 3745-52-34(D), 3745-50-41(A), 3745-50-45(A) [40 CFR §§ 270.1(c), 270.10(a), (d)]. Upon failing to comply with the conditions for a permit exemption specified in Nos. 2-6 above, Newark Electro Plating violated the permitting requirements of OAC 3745-52-34(D), 3745-50-41(A), 3745-50-45(A) [40 CFR §§ 270.1(c), 270.10(a), (d)].

At this time, EPA is not requiring Newark Electro Plating to apply for either an Ohio storage permit or EPA storage permit, so long as it immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Derrick Samaranski, U.S. EPA Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Derrick Samaranski, of my staff, at (312) 886-7812.

Sincerely,



Paul Little  
Acting Chief, RCRA Branch  
Land and Chemicals Division

Enclosures

cc: David Hohmann, Ohio EPA, David.Hohmann@epa.state.oh.us

UNITED ENVIRONMENTAL PROTECTION AGENCY  
REGION 5, LCD, RCRA BRANCH, LR-8J  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Newark Electro Plating, Inc.  
EPA ID No.: OHD004294468  
ADDRESS: 30-32 East Harrison Street  
Newark, Ohio 43055  
DATE OF INSPECTION: May 18, 2011  
EPA INSPECTOR: Derrick Samaranski, LCD, RCRA, CS2

PREPARED BY:

Derrick Samaranski  
Derrick Samaranski

06/28/2011  
Date Completed

ACCEPTED BY:

Paul Little  
Paul Little, Chief  
Compliance Section 2

6-29-11  
Date

### **Purpose of Inspection**

This inspection was an evaluation of Newark Electro Plating, Inc. (Newark Electro Plating) compliance with hazardous waste regulations found at Ohio Administrative Code (OAC) and the Code of Federal Regulations (CFR). The inspection was an EPA lead RCRA Compliance Evaluation Inspection (CEI).

### **Participants**

Derrick Samaranski, U.S. EPA  
David Hohmann, Ohio EPA

Site Representatives:

Mike Shaner, H.R. Manager

### **Introduction**

We arrived at the location of the Newark Electro Plating facility at 10:10 AM, and asked the receptionist to inform Mr. Shaner that we were visiting Newark Electro Plating to conduct a hazardous waste compliance inspection. Mr. Shaner arrived in the reception area shortly after our arrival; I presented my official credentials, gave him my business card, and explained the purpose of our visit.

During the opening conference with Mr. Shaner I asked for a description of Newark Electro Plating operations, and listing of solid and hazardous waste streams generated by the facility.

### **Site Description**

Newark Electro Plating facility is a zinc and nickel plating parts shop serving the automotive industry. The facility began its operations in 1950. It occupies 40,000 square feet of area, currently employs eleven people, and operates during 4 10-hour shifts per week. At the time of the inspection Newark Electro Plating operated as a large quantity generator of hazardous waste.

The manufacturing operations at Newark Electro Plating consist of seven plating departments that include: nickel chrome, barrel, zinc auto, and zinc manual hoist plating lines. At the time of the inspection only five departments were being actively used. Dept. 7 process tanks were removed several weeks prior to the inspection, and Dept. 5 process tanks were empty with the exception of the zinc tank which was holding usable zinc solution.

Typical plating process at Newark Electro Plating begins with electro cleaner (HCl) tank followed by zinc pre-dip (weak acid solution), zinc tank, auto drag out, chromate pre-dip, chromate tank, and rinse. Newark Electro Plating offers several different chromates finishes



which include: clear, hexavalent free yellow, hexavalent yellow and olive drab. After plating parts are steam dried, packaged and offered for shipment to customers.

Plating operations at Newark Electro Plating generate: hazardous waste filter cake (F006), and infrequently used plating solutions (D002, D007). In addition to hazardous waste streams Newark Electro Plating also generates small quantities of universal waste lamps.

Newark Electro Plating used process knowledge, and Material Data Safety Sheets (MSDS) to conduct waste determinations of its hazardous waste streams. Table 1 lists Newark Electro Plating's hazardous waste streams and their approximate generation rates:

Waste Type	Potential Hazardous Constituent/Characteristic	EPA Waste Code	Generation Rate <sup>1</sup>
Wastewater Filter Cake	Chromium	F006	9,000 lbs/month
Spent Plating Solution	Corrosivity, Chromium	D002, D007	Last generated in March of 2008

**Table 1: Wastes Generated at Newark Electro Plating**

### **Site Tour**

The site walk-through of the Newark Electro Plating operations started at 12:25 PM, and began with a visit to Dept. 1 plating line which consists of six process tanks that vary in volume from 80 to 920 gallons. Plating line in Dept. 1 is a barrel, hexavalent chrome single rinse line. At the time of our visit to Dept. 1, I observed that the some of the process tanks were missing baffles to reduce drag out between tanks, and liquid process solution was visible on the floor between tanks. Several of the metal process tanks were exhibiting signs of chemical corrosion and rusting.

Next, we visited Dept. 2 where Newark Electro Plating conducts hexavalent yellow chrome plating, and boiler room. In Dept. 2 we looked at a trench next to the plating line which Ohio EPA asked Newark Electro Plating to line with coating in 2007. The trench serves to capture leaked process solutions from the plating tanks and tank piping. I observed that the coating of the trench was severely deteriorated, and in places in need of repair. In the boiler room Newark Electro Plating dispenses water treatment chemicals into the boiler. During our visit, I observed two plastic 55-gallon drums in the boiler room. One was empty and the other dispensing water treatment chemicals in to the boiler.

From the boiler room, we continued the site visit by looking at Newark Electro Plating's hazardous waste F006 filter cake accumulation roll-off box in warehouse area. The twenty cubic

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<sup>1</sup> Values obtained from the 2010 and 2009 Hazardous Waste Manifests

yard roll-off box was labeled as hazardous waste, and had an accumulation start on the label of 01/11/2011. Mr. Shaner explained that the accumulation start date on the roll-off box was incorrect and that the first F006 waste was placed into the box on 04/05/2011. The hazardous waste label on the roll-off box was located on a side of the box that was very inaccessible and required moving the roll-off box away from the wall with a forklift. I suggested to Mr. Shaner that placing the label on the front of the roll-off box will make things easier for inspections. The roll-off box was open during our visit and according to Mr. Shaner no hazardous waste was being added to roll-off box during the day of the inspection. According to Mr. Shaner, Newark Electro Plating quit conducting weekly inspections of the hazardous waste roll-off box, and relies on employees walking by the roll-off box.

Next, we visited Dept. 3 zinc auto plating line and wastewater treatment area. In Dept. 3 Newark Electro Plating stores solidified caustic in a 9-10 feet deep tank. According to Mr. Shaner there is about two feet of the solidified caustic material in the tank. Newark Electro Plating stopped using the tank five years ago and plans on cutting up the tank and analyzing the material before disposal. In the wastewater treatment area Newark Electro Plating operates a sludge filter press which generates the facility's hazardous waste filter cake sludge (F006). Once pressed the filter cake sludge is first accumulated in a 3x3x3 metal box which is emptied to the roll-off box in the warehouse area. According to Mr. Shaner the cubic yard box from the wastewater treatment area could be emptied once every four hours to once every three days, typically its emptied once every day. At the time of our visit, the cubic yard container in the wastewater treatment area was open and no hazardous wastes were being added to it. The cubic yard box was labeled hazardous waste and was half full. The closure top for the box was located next to it. Newark Electro Plating bleeds spent acid generated from the plating lines to neutralize caustic solutions in the wastewater treatment area. For that purpose the facility operates a small lined acid pit to accumulate acid from the plating lines and acid storage tank which bleeds into the wastewater treatment neutralization tank.

Following our visit to Dept. 3 and wastewater treatment area, we visited Dept. 5 and Dept. 6. All of the tanks in Dept. 5 are empty with the exception of one process tanks which stores good zinc process solution. Dept. 6 is an auto zinc line which is still in use. In Dept. 6 I observed a tank that was not part of plating line that was storing one foot of sludge. Mr. Shaner explained that the tank has been taken out of service nine years ago, but was not sure what kind of sludge was stored in the tank. I suggested that the sludge should analyzed before disposal.

Next, we visited a Chemical Storage area, and Dept. 4. In the Chemical Storage area Newark Electro Plating stores process chemicals and good process solutions. At the time of our visit to the Chemical Storage area, I observed a plastic container accumulating zinc acid solution which Mr. Shaner identified as being a reusable material. In addition to the zinc acid container, I also observed a plastic tote that was approximately one fifth full and was labeled as zinc solution. In Dept. 4 I observed build-up of chemical material on the outside of one the process tanks (alkaline tank, 4-14).

Next, we visited Dept. 7 which at the time of our visit was in the process of being decommissioned. On the way to Dept. 7 we stopped by Dept. 3 and looked at a Crystal Clean parts washer; spent solvent is managed by Crystal Clean. In Dept. 7 I observed a decommissioned zinc process tank which held sludge and liquid (tank half full), and a second smaller tank Mr. Shaner identified as holding acid which was going to be bled into the wastewater treatment neutralization tank. According to Mr. Shaner the zinc solution will be boiled out and sludge disposed. In another part of Dept. 7 I observed nine plastic 55-gallon drums which were labeled spent acid (four drums), olive drab (three drums), and old olive drab (two drums). According to Mr. Shaner spent acid will be bled into the wastewater treatment, and the olive drab will be treated in the wastewater treatment area for chrome. None of the drums had hazardous waste labels or accumulation start dates. Concrete rubble generated from removing equipment in Dept. 7 will be disposed in the F006 roll-off box. In corner of Dept. 7 Newark Electro Plating was accumulating used fluorescent bulbs, and a 55-gallon drum of potassium hydroxide. The bulbs were being accumulated loosely and were not labeled. The potassium hydroxide will be evaluated to determine if it has further uses.

The site walk-through of Newark Electro Plating ended with a visit to a small quality control lab, where according to Mr. Shaner the facility conducts titrations of the plating solutions. All waste generated from the lab is disposed into the wastewater treatment sump. The walk-through ended at 1:50 PM.

### **Records Review**

For the records review at Newark Electro Plating I requested to see: manifest records for the last three years of operation (2011- 2008), waste analysis determinations for waste streams generated at the facility, employee training records, Land Disposal Restriction (LDR) forms, last three annual hazardous waste reports, contingency plan, weekly inspections of the hazardous waste storage area, and universal waste shipment documents.

First, I reviewed the hazardous waste manifests for off-site shipments of wastes for years 2011-2008. In 2008 Newark Electro Plating had seven off-site shipments of F006 waste and one off-site shipment of D002, D007 caustic. LDRs for the D002, D007 and F006 wastes were attached to the hazardous waste manifests. In 2009 and 2010 the facility had five and three off-site shipments of F006 waste, respectively. Newark Electro Plating offers its hazardous wastes to Enviroline of Ohio (OHD980568992). No off-site shipments of hazardous wastes were offered for off-site disposal in 2011. All of the reviewed hazardous waste manifests and LDRs were properly completed and signed.

Next, I reviewed the Newark Electro Plating's last three annual hazardous waste reports which were filed with Ohio EPA on 02/22/11, 02/18/2010 and 02/10/2009. In 2010 the facility reported generating thirty- nine tons of hazardous waste, sixty- six tons in 2009, and one hundred fifteen tons in 2008.

After reviewing the hazardous waste manifests, LDRs, and annual hazardous waste reports I reviewed Newark Electro Plating employee training records. I reviewed employee training sign in list for fire extinguisher, MSDS, lock out/tag out, and PPE training that was offered on 01/20/2010; Haz. Com., fire extinguisher, lock out/tag out, PPE, and fire drill training offered on 12/16/2008; Haz. Com., fire extinguisher, lock out/tag out, PPE training offered on 04/18/2007. I also reviewed Safety Training Memorandum from 2007, and training matrices of training offered in 2007 and 2006. The review of the training matrices revealed that Newark Electro Plating conducted last hazardous waste training in 2006. No other employee training records were available for my review.

Next, I reviewed Newark Electro Plating's weekly hazardous waste inspection reports and the Contingency Plan. The inspection records were kept till January of 2010. More recent weekly inspections of the hazardous waste storage area were not kept. Review of the Contingency Plan did not reveal any issues of concern.

Next, I reviewed Newark Electro Plating's Hazardous Waste Management Procedures manual which included job descriptions and listed training required by for each position. I also reviewed the Newark Electro Plating's Hazard Communication Plan.

For waste determination records I reviewed waste approval form from EQ Ohio (OHD980568992) for the F006 hazardous waste stream, waste profile for wastewater treatment sludge (F006), and spent caustic cleaner (D002, D007) from Envirite.

Next, I reviewed a universal waste shipment document which listed fifty seven used fluorescent lamps which were shipped to Veolia Environmental Services in 09/12/2008. No other records were available for review.

### **Closing Conference**

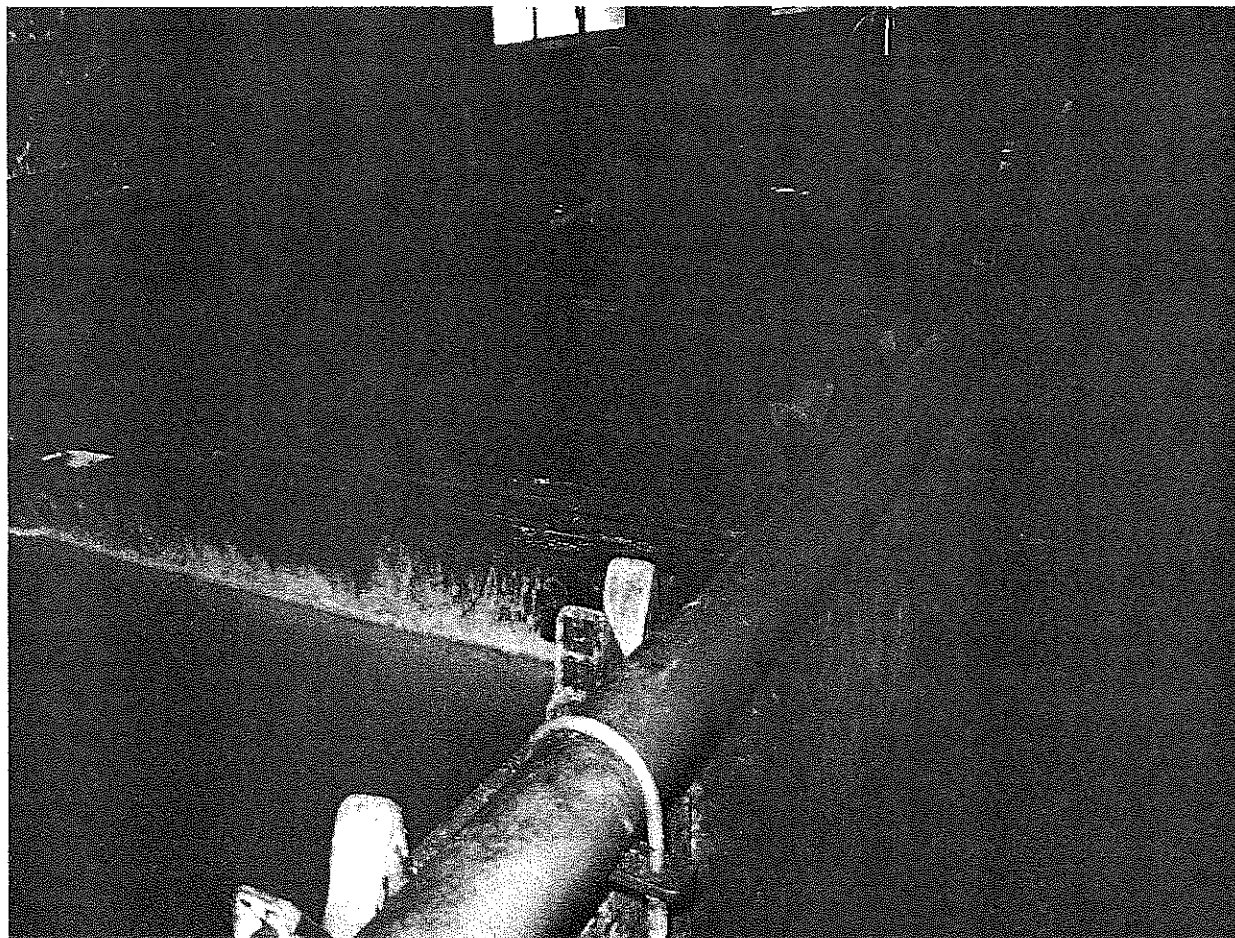
For the inspection close-out conference I discussed container closure, weekly inspections of the storage area, facility maintenance, employee training, records keeping, and universal waste management standards. The inspection of the facility ended at 3:25 PM.

### **Attachments**

- A. Photographs
- B. Checklists
- C. List of Documents Copied/Obtained During Inspection

**ATTACHMENT A**  
**Photographs**

**Newark Electro Plating, Inc.**  
**OHD004294468**

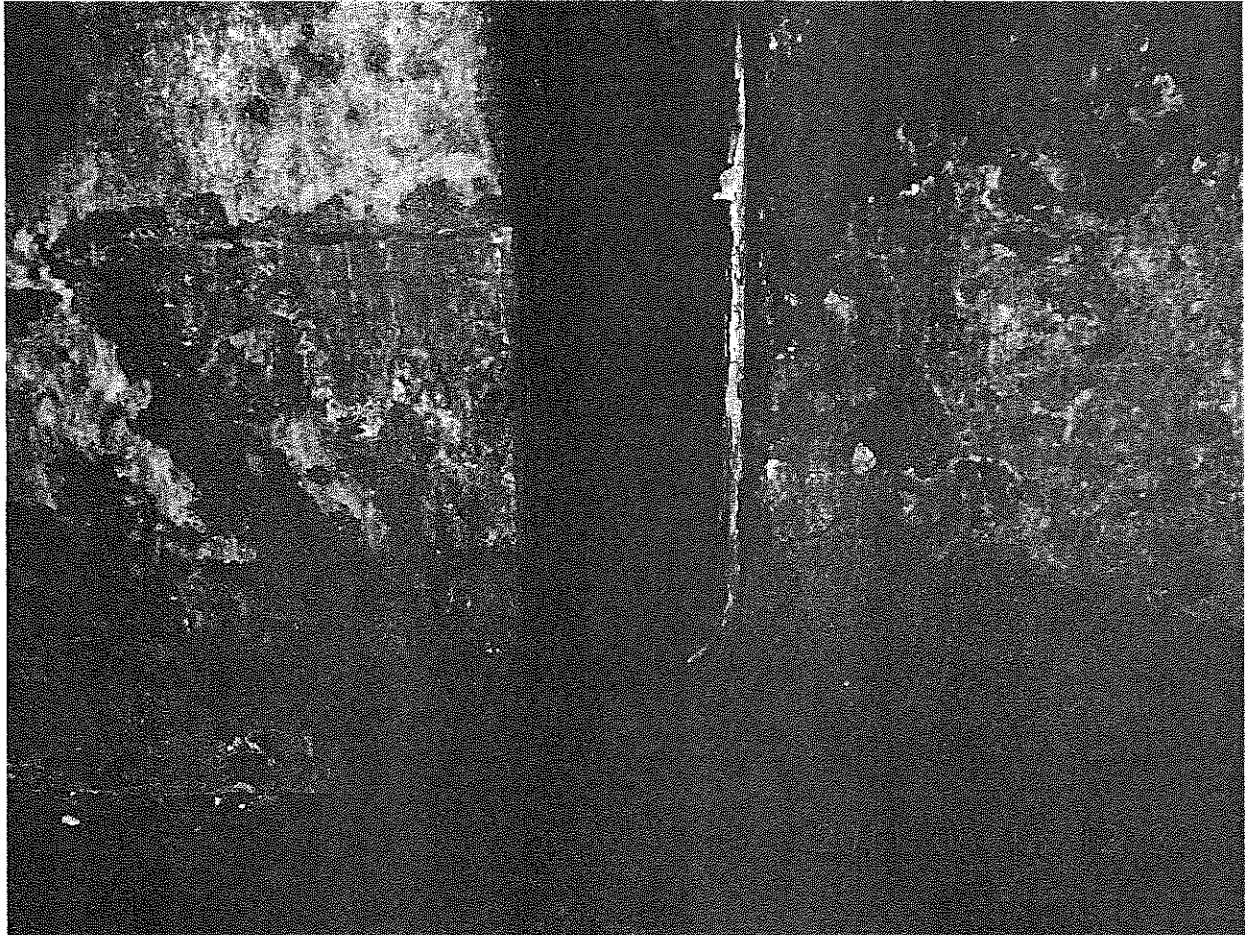


**Photograph Number: 1**

**Photographer: Derrick Samaranski**

**Photograph Description: Dept.1 plating tanks missing baffles between the tanks.**

Newark Electro Plating, Inc.  
OHD004294468



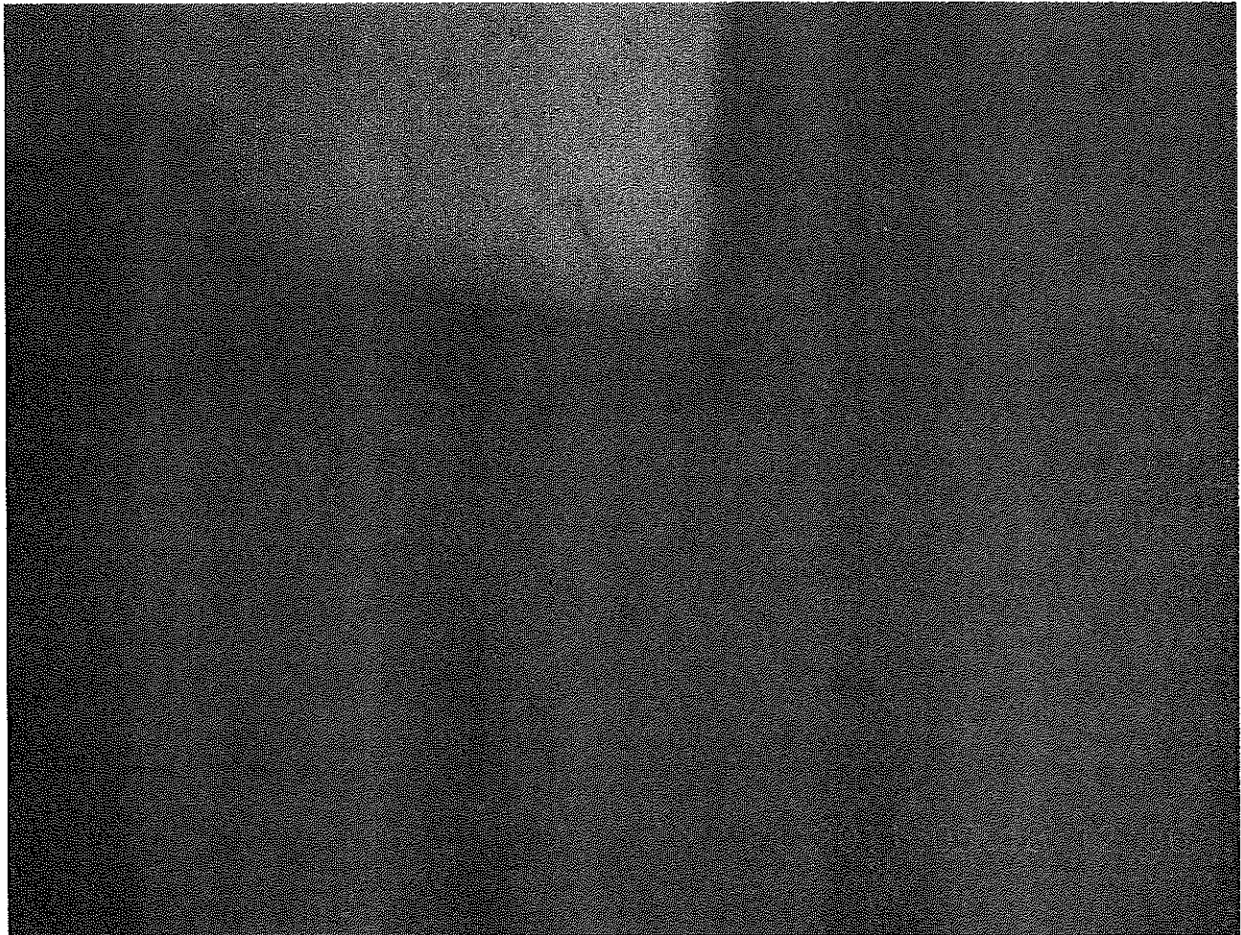
**Photograph Number:** 2

**Photographer:** Derrick Samaranski

**Photograph Description:** Area between process tanks in Dept. 1 with drag out liquid.



Newark Electro Plating, Inc.  
OHD004294468

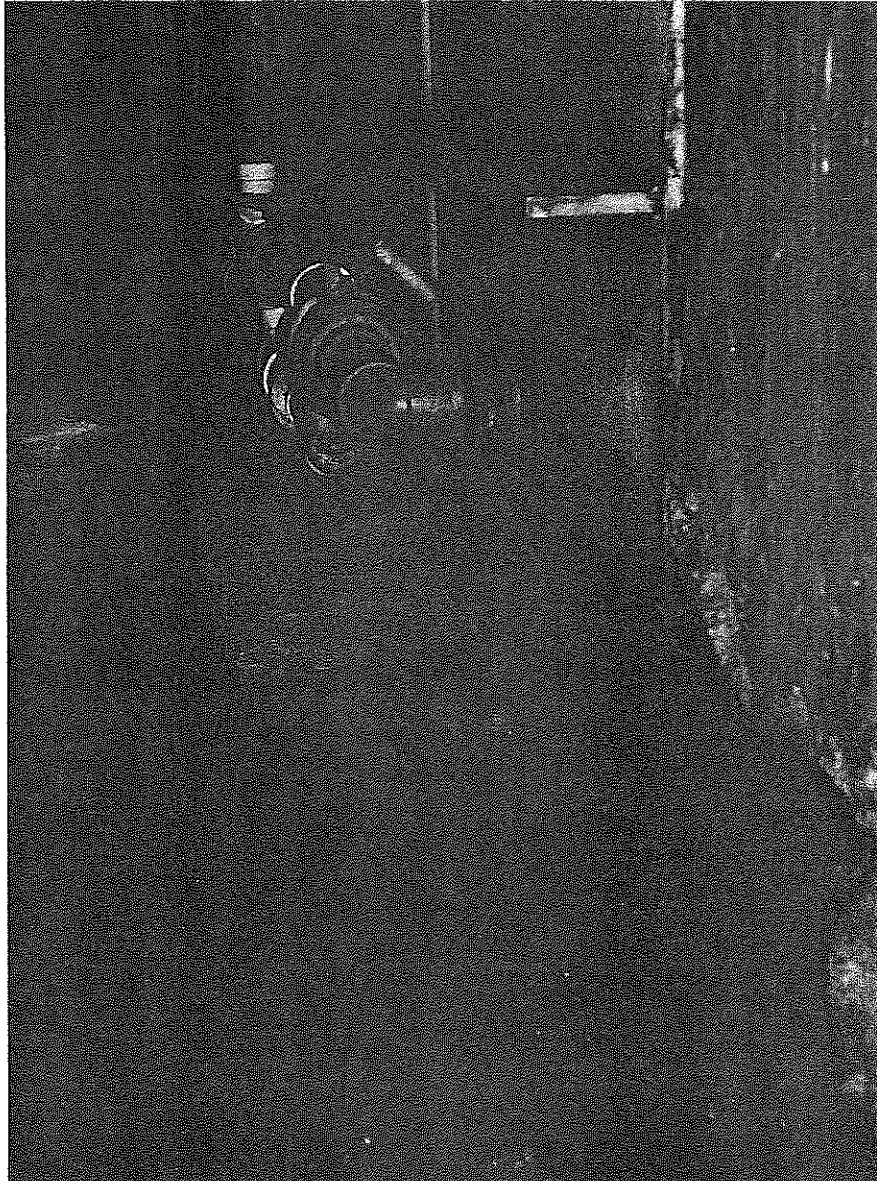


**Photograph Number:** 3

**Photographer:** Derrick Samaranski

**Photograph Description:** Corrosion and chemical build up in the trench next to plating line in Dept. 2.

Newark Electro Plating, Inc.  
OHD004294468



**Photograph Number:** 4

**Photographer:** Derrick Samaranski

**Photograph Description:** Wide angle view of the trench in Dept. 2.



Newark Electro Plating, Inc.  
OHD004294468

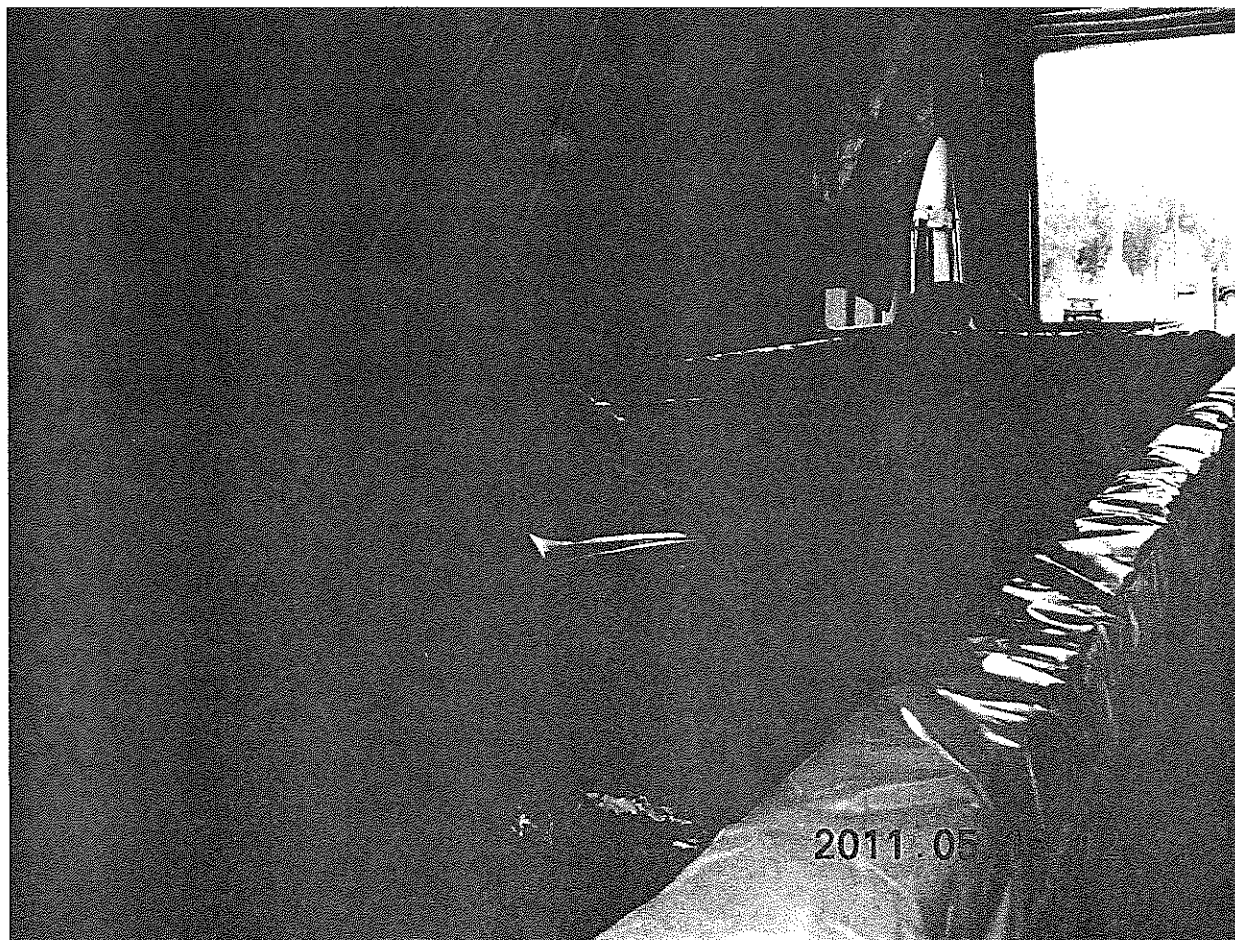


**Photograph Number:** 5

**Photographer:** Derrick Samaranski

**Photograph Description:** Hazardous waste roll-off box accumulating F006 waste in the facility's warehouse.

Newark Electro Plating, Inc.  
OHD004294468

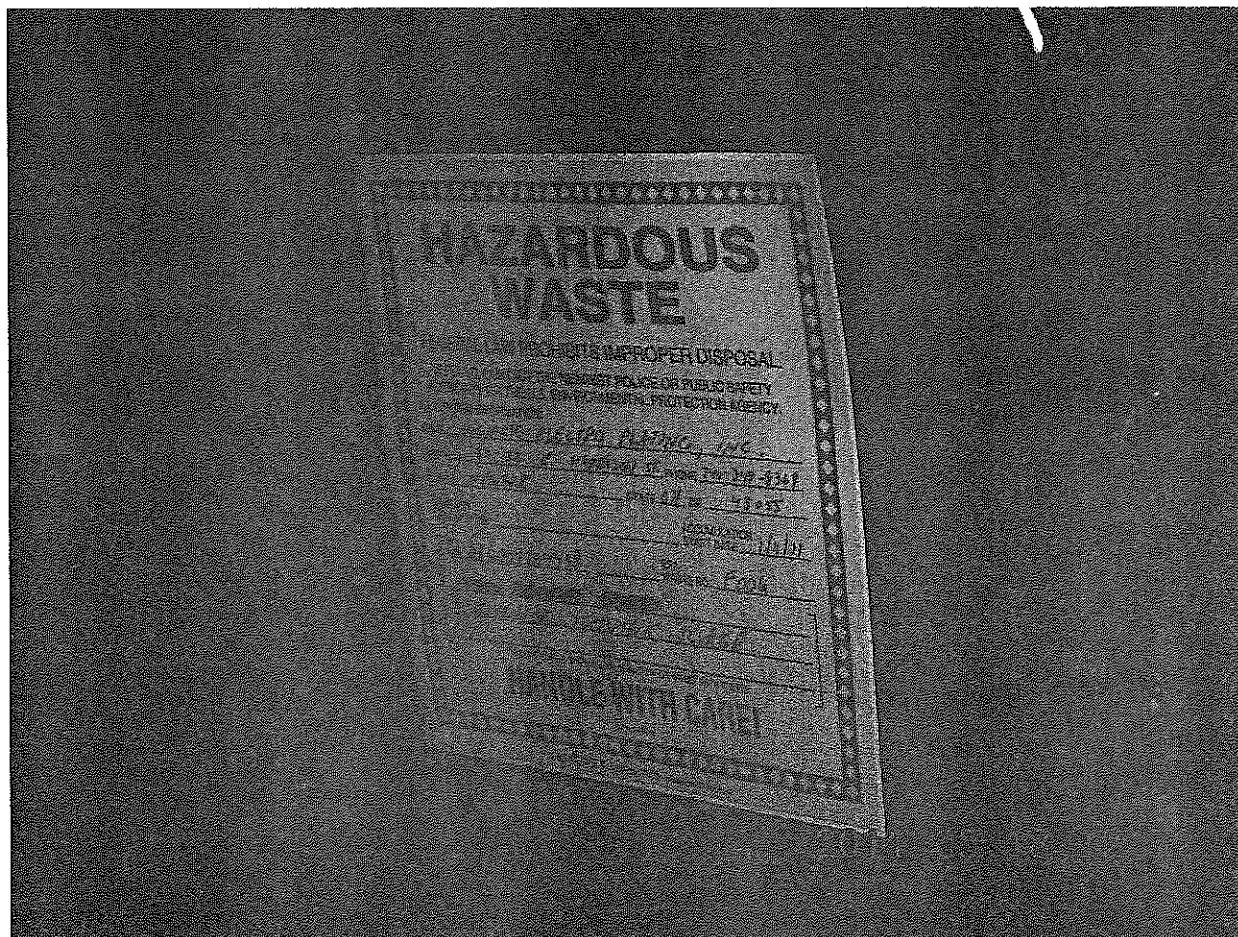


**Photograph Number:** 6

**Photographer:** Derrick Samaranski

**Photograph Description:** F006 waste inside the roll-off box pictured in photo #5.

Newark Electro Plating, Inc.  
OHD004294468



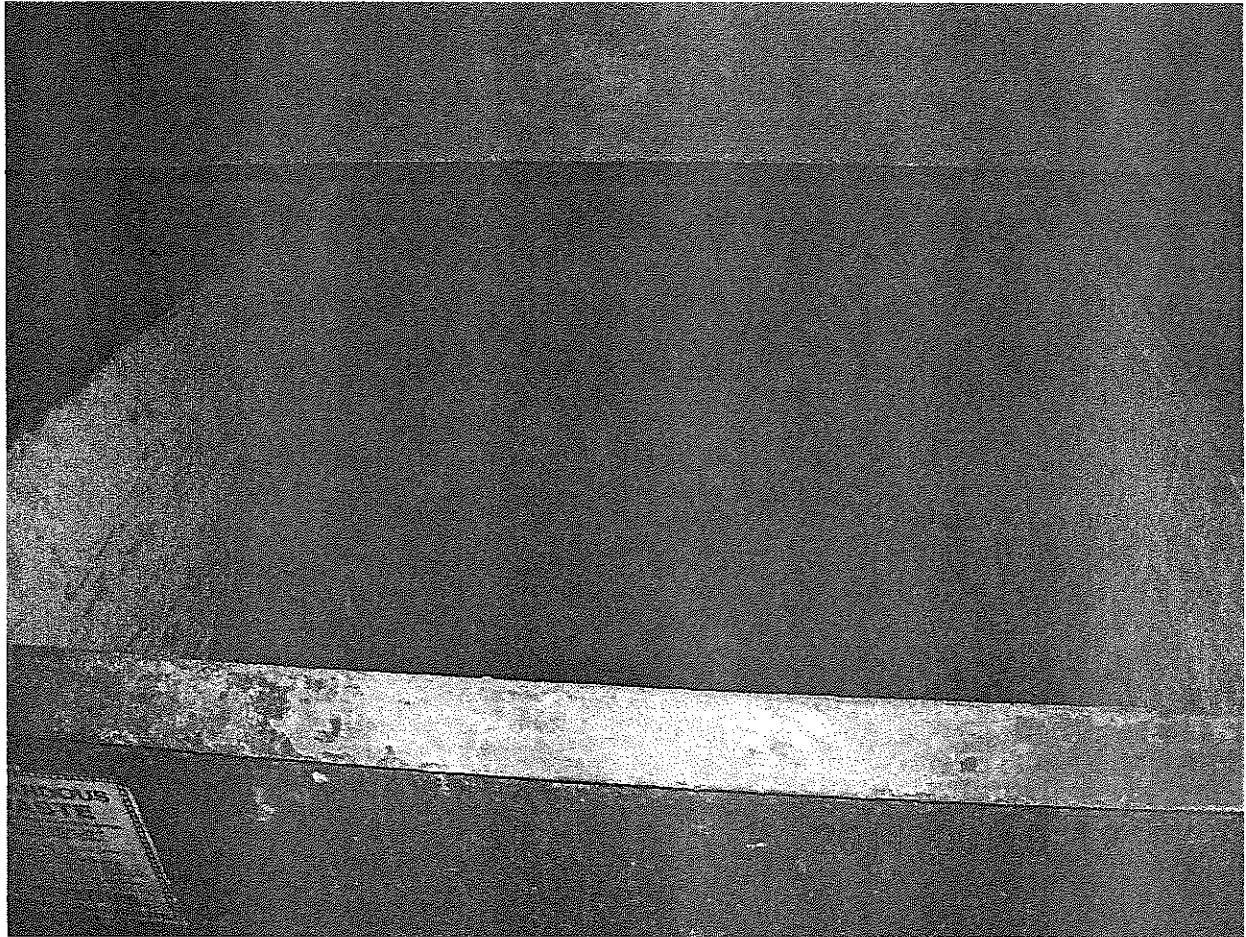
**Photograph Number:** 7

**Photographer:** Derrick Samaranski

**Photograph Description:** Label on the F006 roll-off box showing accumulation start date of 01/11/2011.



Newark Electro Plating, Inc.  
OHD004294468

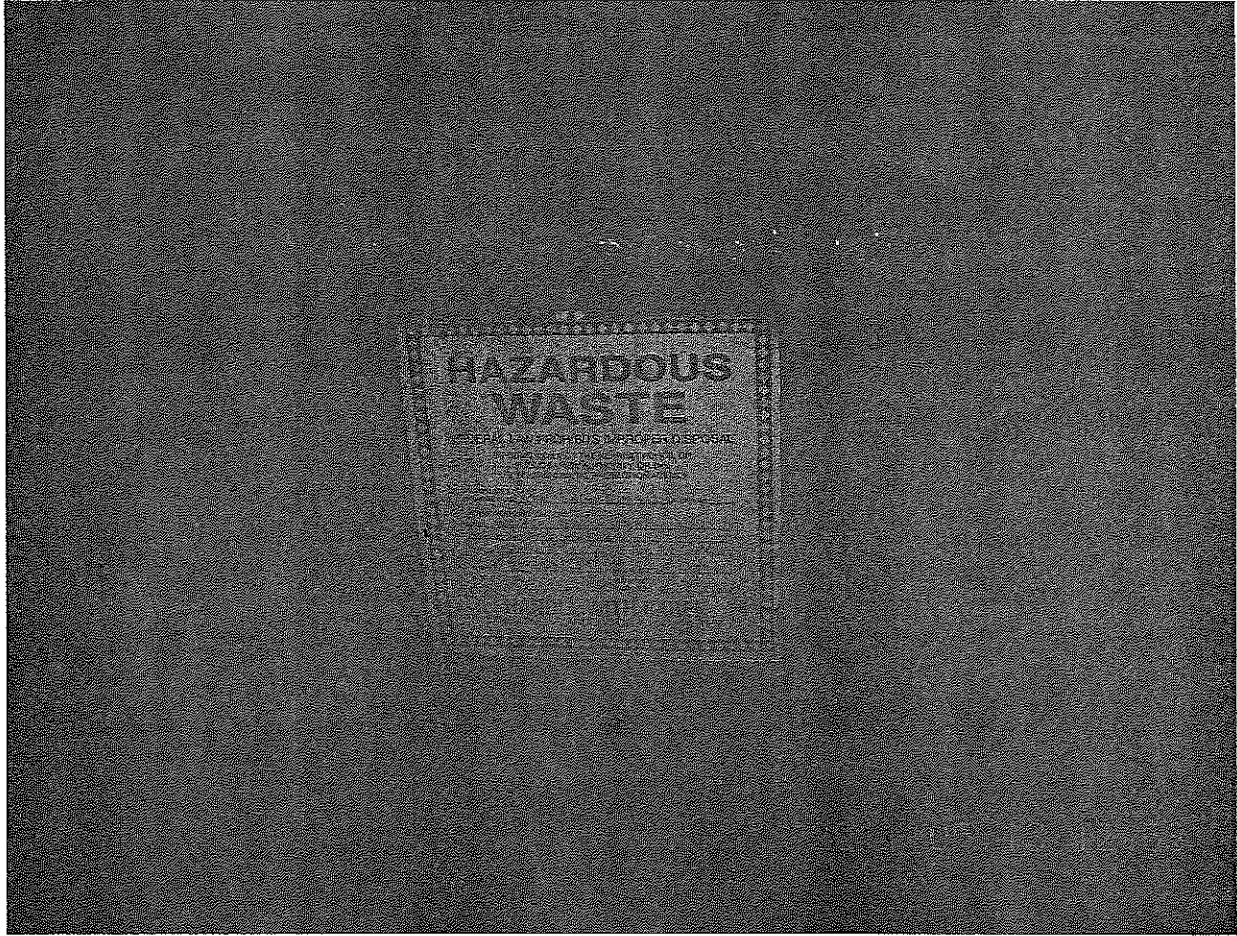


**Photograph Number:** 8

**Photographer:** Derrick Samaranski

**Photograph Description:** Satellite container accumulating F006 waste in the facility's wastewater treatment area.

Newark Electro Plating, Inc.  
OHD004294468

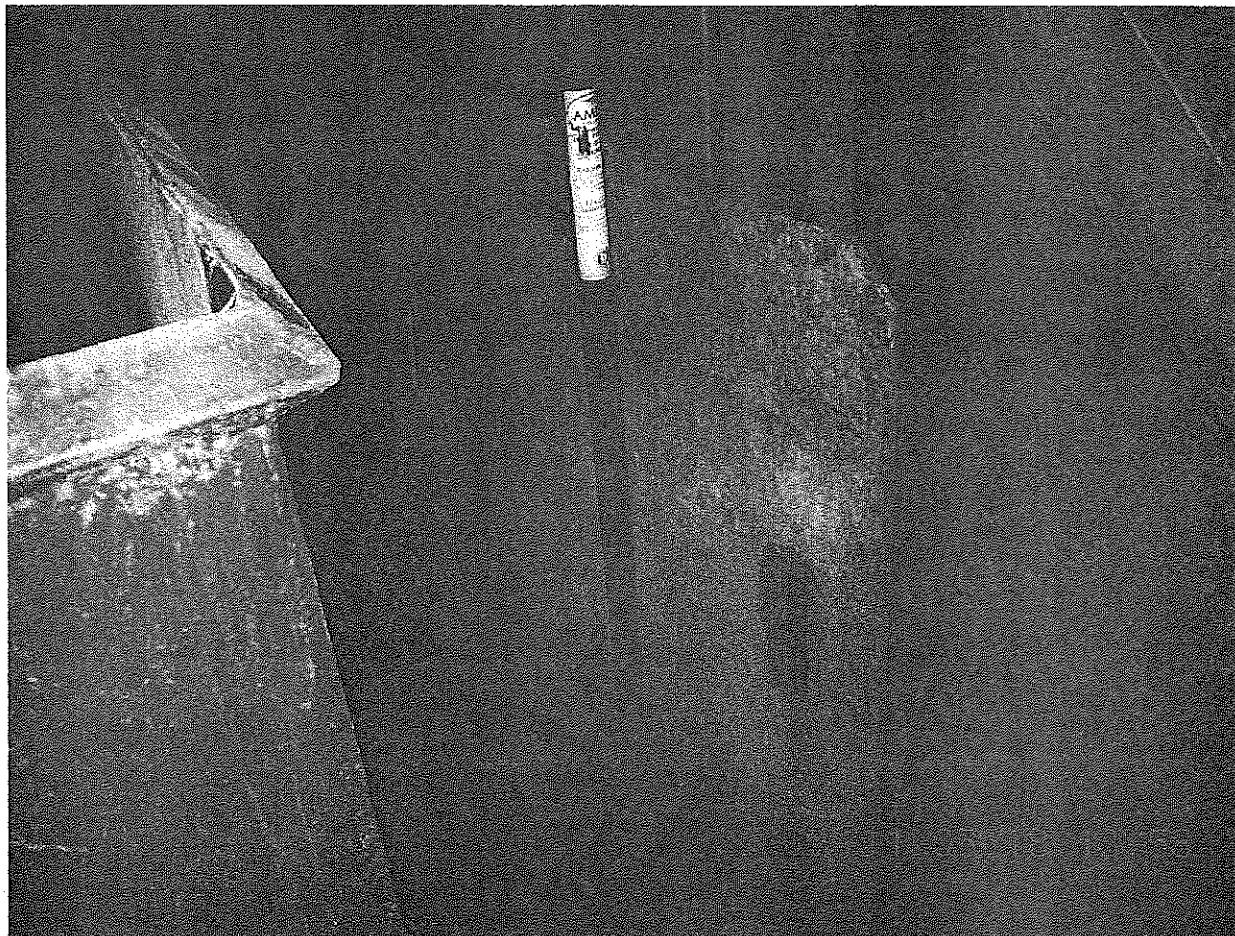


**Photograph Number:** 9

**Photographer:** Derrick Samaranski

**Photograph Description:** Hazardous waste label on the F006 satellite container in the wastewater treatment area.

Newark Electro Plating, Inc.  
OHD004294468



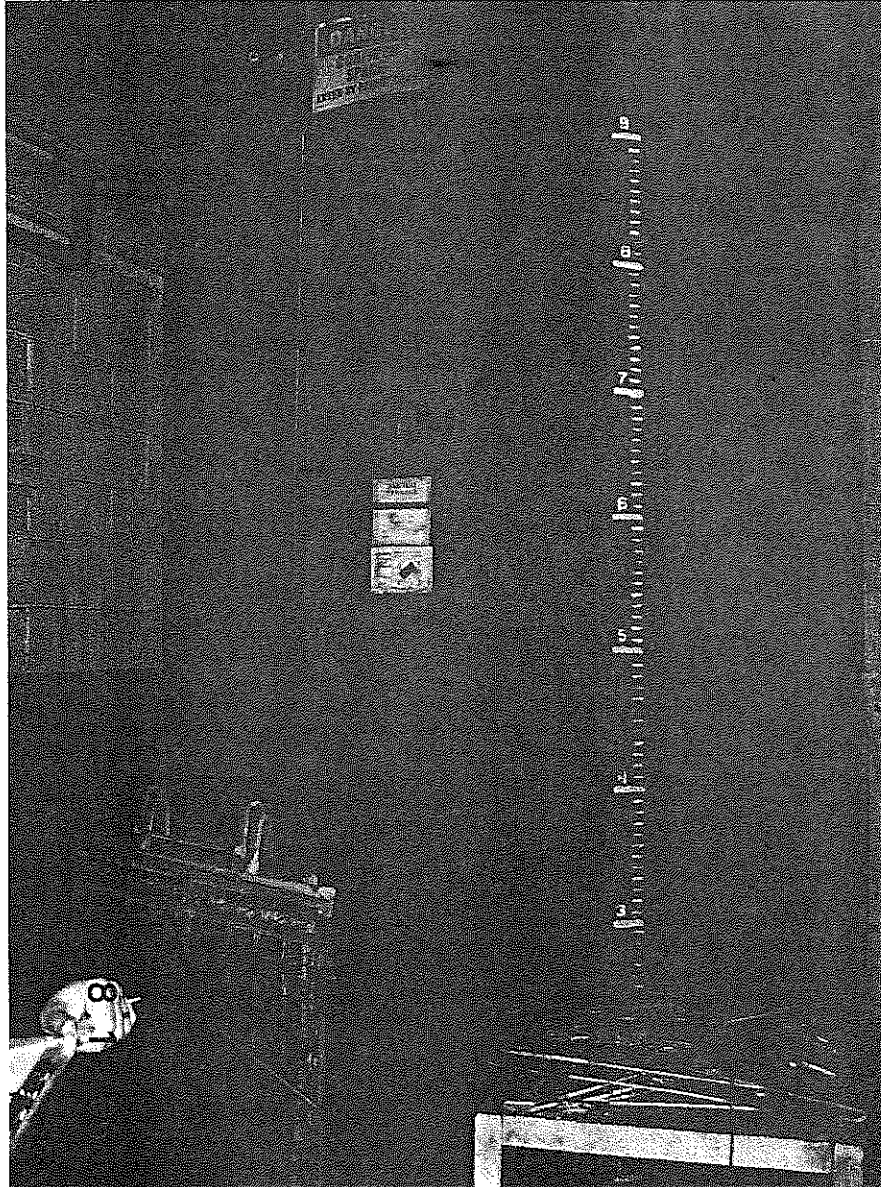
**Photograph Number:** 10

**Photographer:** Derrick Samaranski

**Photograph Description:** Closure top next to the open F006 satellite container in the wastewater treatment area.



Newark Electro Plating, Inc.  
OHD004294468

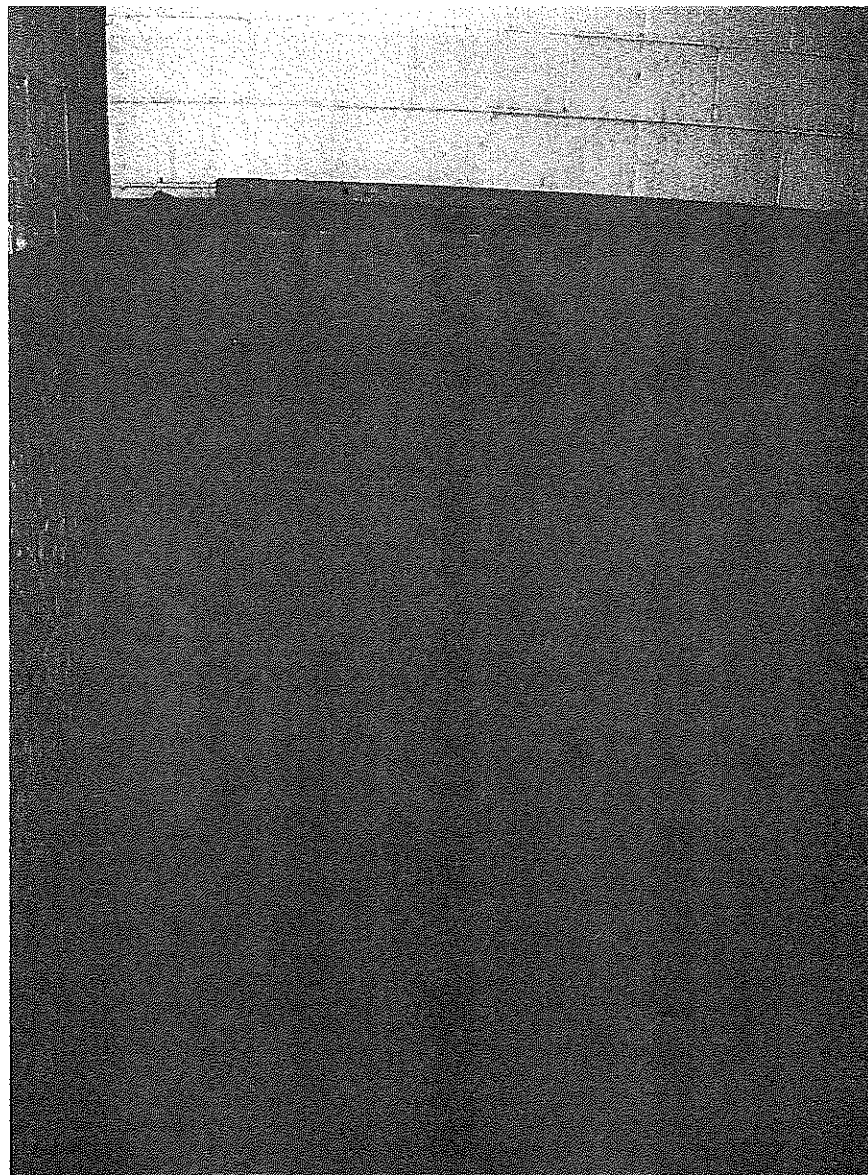


**Photograph Number:** 11

**Photographer:** Derrick Samaranski

**Photograph Description:** Tank accumulating solidified caustic in Dept. 3 (2 feet of material).

Newark Electro Plating, Inc.  
OHD004294468



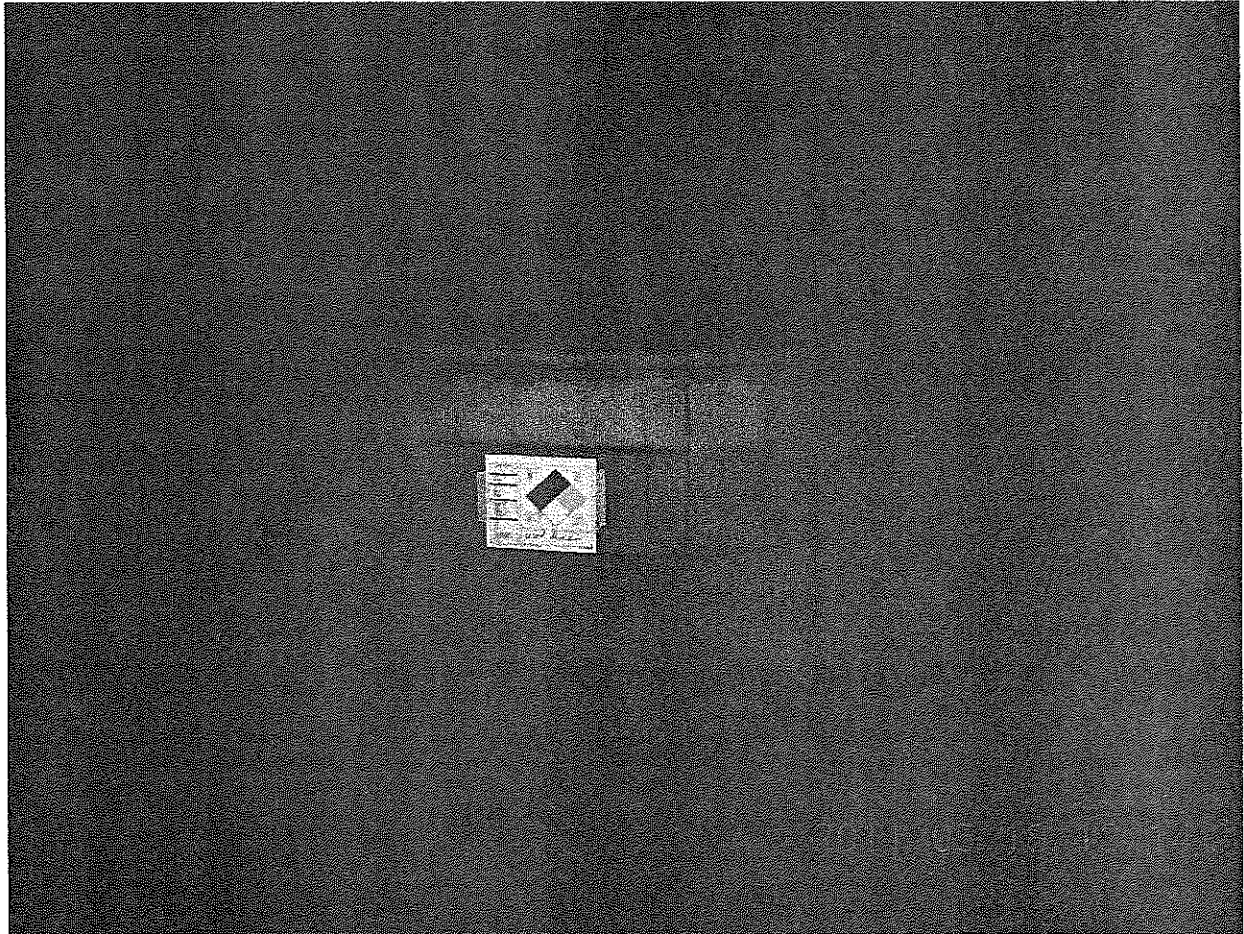
**Photograph Number:** 12

**Photographer:** Derrick Samaranski

**Photograph Description:** Tank accumulating sludge in Dept. 6.



Newark Electro Plating, Inc.  
OHD004294468



**Photograph Number:** 13

**Photographer:** Derrick Samaranski

**Photograph Description:** Tank with reusable zinc in the Chemical Storage area.

Newark Electro Plating, Inc.  
OHD004294468

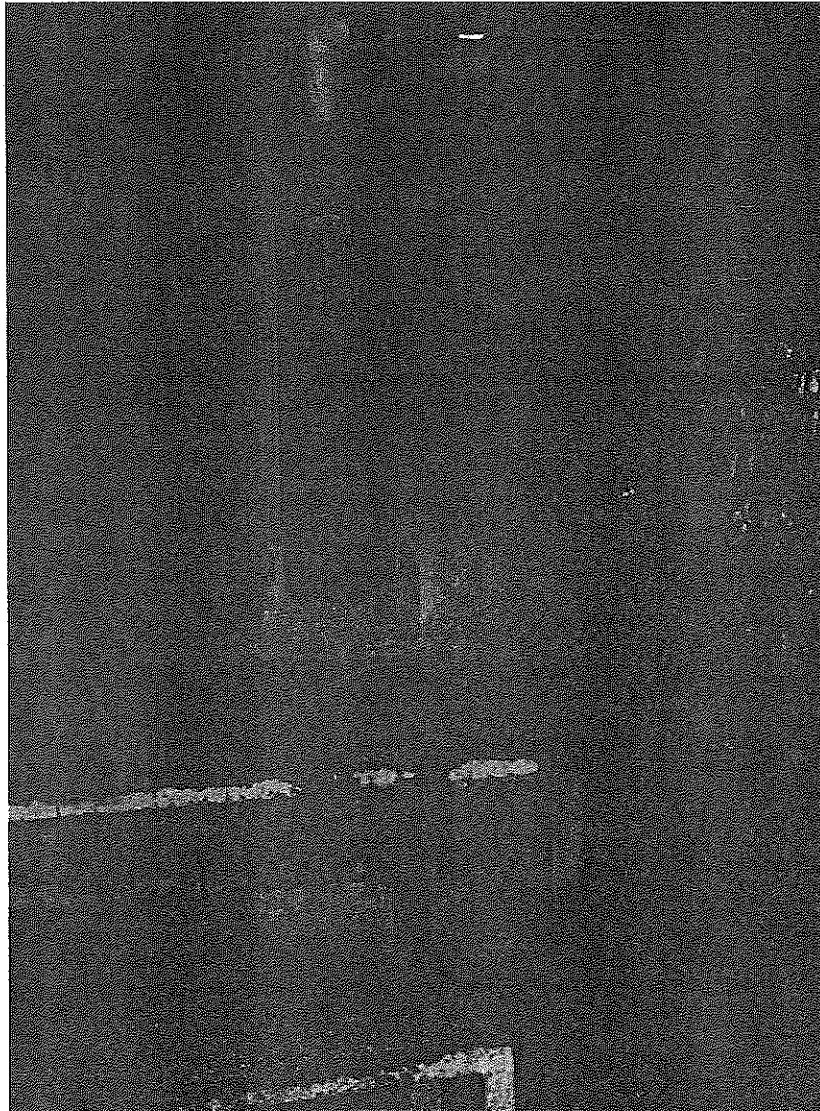


**Photograph Number:** 14

**Photographer:** Derrick Samaranski

**Photograph Description:** Tote with some zinc solution in the Chemical Storage area.

Newark Electro Plating, Inc.  
OHD004294468



**Photograph Number:** 15

**Photographer:** Derrick Samaranski

**Photograph Description:** Chemical build-up around tank 4-14 in Dept. 4.

Newark Electro Plating, Inc.  
OHD004294468



**Photograph Number:** 16

**Photographer:** Derrick Samaranski

**Photograph Description:** Containers of spent acid and olive drab in Dept. 7.



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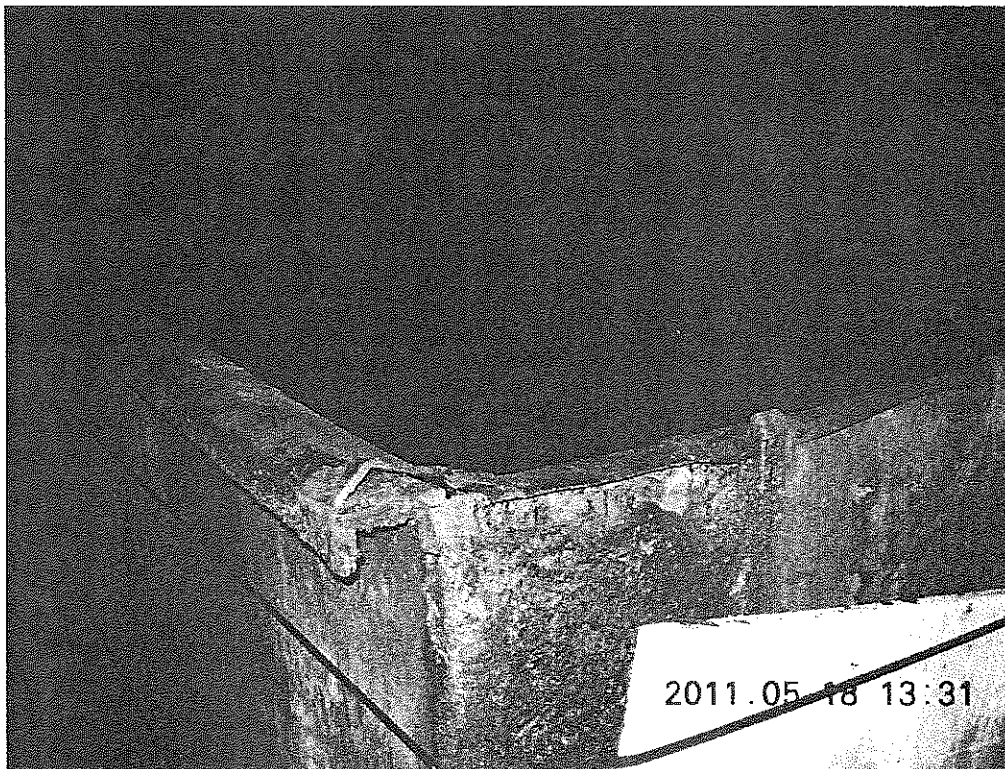


**Photograph Number:** 17

**Photographer:** Derrick Samaranski

**Photograph Description:** Decommissioned tank with sludge and zinc solution in Dept. 7.

Newark Electro Plating, Inc.  
OHD004294468

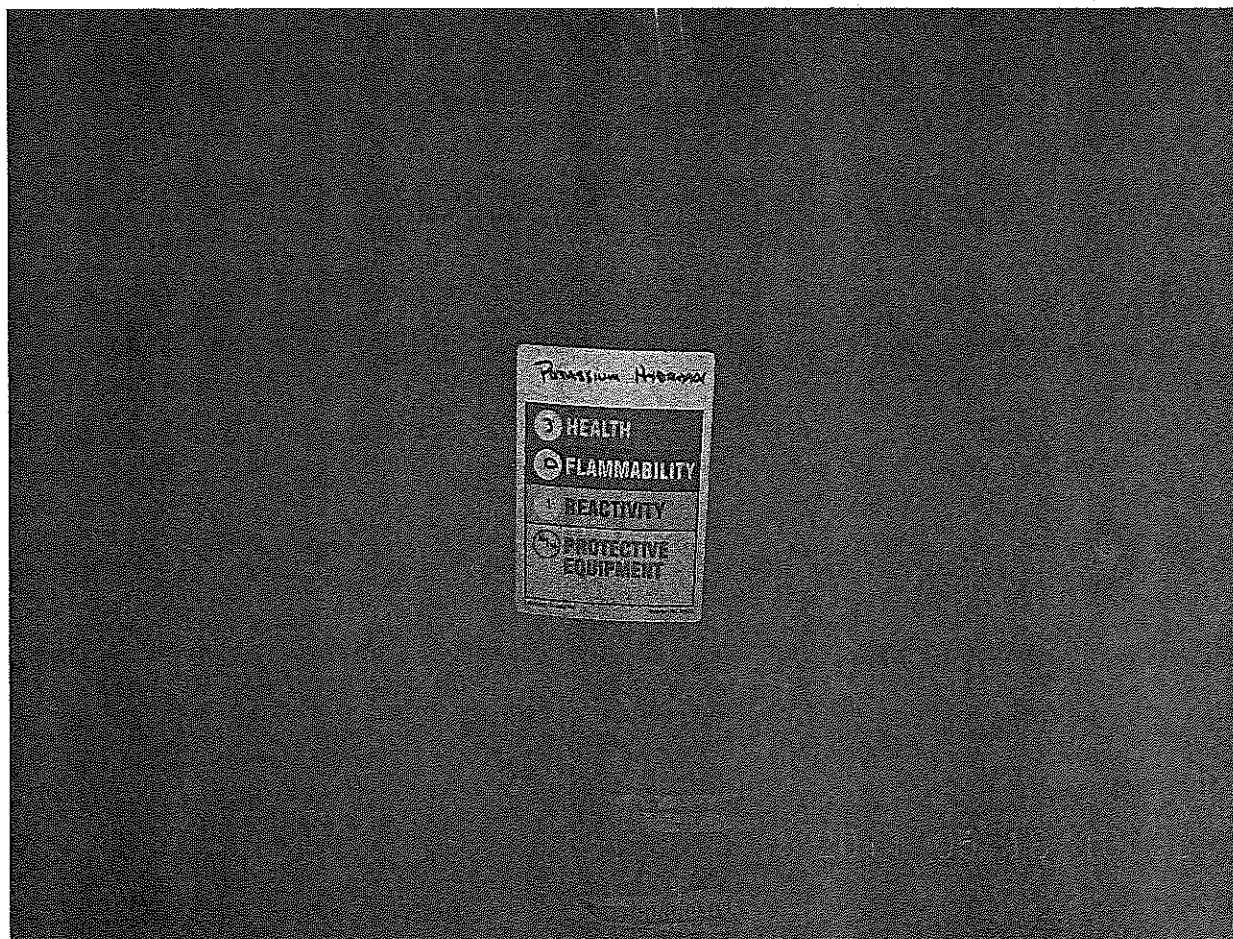


**Photograph Number:** 18

**Photographer:** Derrick Samaranski

**Photograph Description:** Decommissioned tank with acid solution in Dept. 7 to be processed in wastewater treatment area.

Newark Electro Plating, Inc.  
OHD004294468

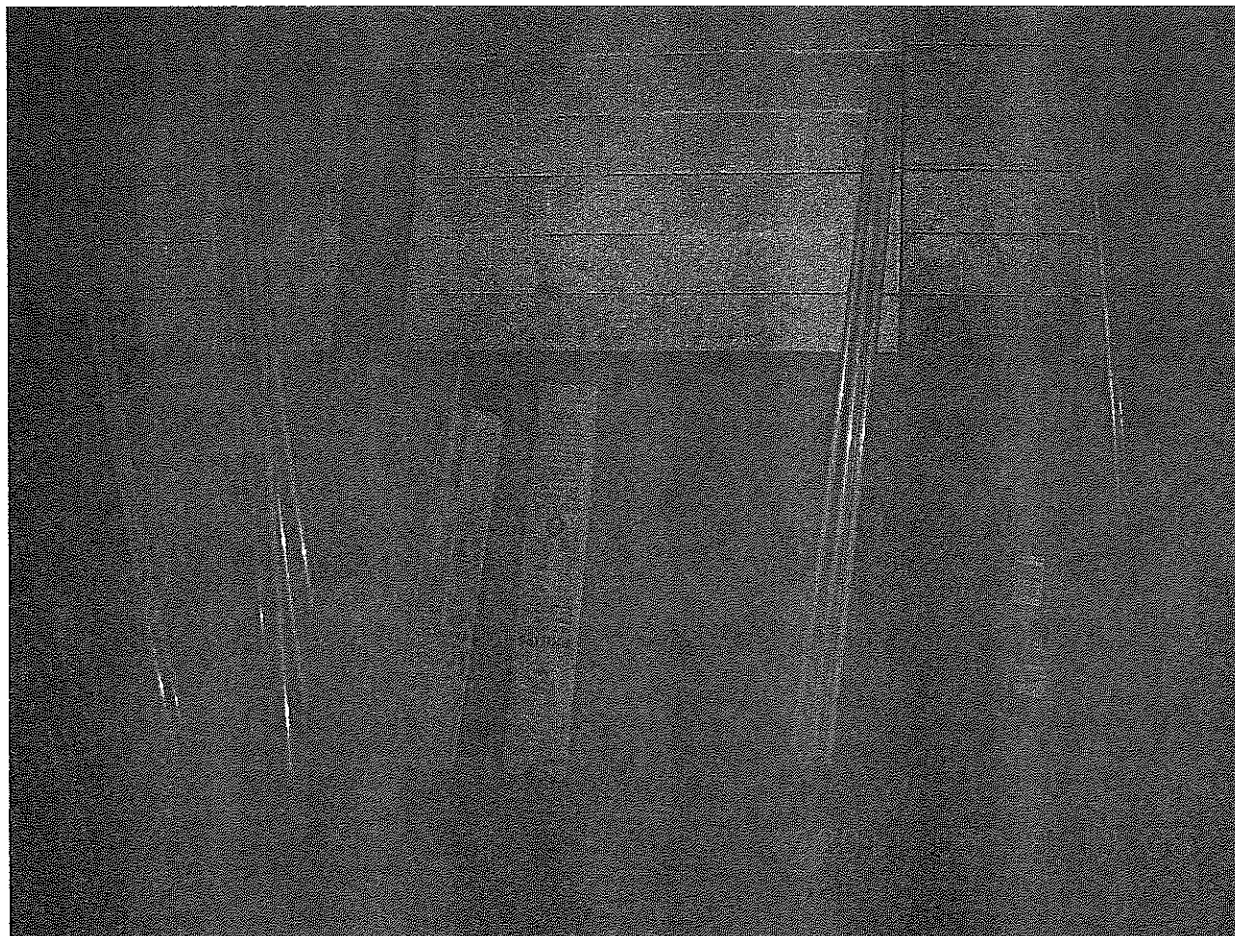


**Photograph Number:** 19

**Photographer:** Derrick Samaranski

**Photograph Description:** Container of potassium hydroxide in Dept. 7.

Newark Electro Plating, Inc.  
OHD004294468



**Photograph Number:** 20

**Photographer:** Derrick Samaranski

**Photograph Description:** Used fluorescent lamps in Dept. 7.



**ATTACHMENT C**  
**Documents Copied**

<b>Document</b>	<b>Date</b>
Copies of 2008, 2009, and 2010 Hazardous Waste Manifests	05/18/2011
Copy of the Newark Electro Plating Contingency Plan	05/18/2011
Copies of Employee Training Documents	05/18/2011
Universal Waste Shipment Document 2008	05/18/2011
Facility Layout Diagram	05/18/2011

**LARGE QUANTITY GENERATOR REQUIREMENTS**  
**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

LESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

3QG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.

*NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.*

Safety Equipment Used:

**GENERAL REQUIREMENTS**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.*

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

*NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).*

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Complete appropriate checklist for each unit.*

*NOTE: If waste is treated to meet LDRs, use LDR checklist.*

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>MANIFEST REQUIREMENTS</b>		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
<b>PERSONNEL TRAINING</b>		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:	
a.	Job titles? [3745-65-16D(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

b.	Job descriptions? [3745-65-16D(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Completed training or job experience required? [3745-65-16D(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.*

Job Performed	Name of Employee	Date Trained

#### CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]*

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.*

#### EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.					
<b>PREPAREDNESS AND PREVENTION</b>					
34.		Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
35.		Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:			
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Verify that the equipment is listed in the contingency plan.					
36.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
37.		Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
38.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.		If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
40.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
41.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
42.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<b>SATELLITE ACCUMULATION AREA REQUIREMENTS</b>					
43.		Does the generator ensure that satellite accumulation area(s):			
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
44.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>



a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.*

#### USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:	
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: Record location on process summary sheets, photograph the area, and record on facility map.*

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.*

53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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*NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

#### PRE-TRANSPORT REQUIREMENTS

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS		
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more		
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less		
<b>PROHIBITIONS</b>		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>WASTE MANAGEMENT AND LABELING/MARKING</b>		
<b>UNIVERSAL WASTE BATTERIES</b>		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>UNIVERSAL WASTE PESTICIDES</b>		
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and 3745-66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>UNIVERSAL WASTE THERMOSTATS</b>		

14.	Have thermostats that show evidence of leakage, spillage or damage that could cause leaks been contained in a container that is closed, structurally sound, compatible with contents of the thermostats and lacks evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]	
a.	Remove the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
16.	When removing mercury containing ampules from thermostats if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining thermostat units), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(3)(a)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(3)(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
17.	Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE LAMPS</b>		
18.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
19.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</b>		
20.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

ACCUMULATION TIME		
21.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Accumulation is defined as date generated or date received from another handler.		
22.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]  If yes, describe below:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
EMPLOYEE TRAINING		
23.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
24.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
25.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
26.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
OFF-SITE SHIPMENTS		
NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.		
27.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	Is the handler aware of DOT requirements for packaging and shipping?  If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
30.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
31.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
32.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
EXPORTS		



33.	Is waste being sent to a foreign destination? If so:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>